

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**CR. NO. 24-20667**

**Hon. Denise Page Hood**

**D-4, DOMINIQUE GLENN,**

**Defendant.**

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**NOTICE OF REQUEST FOR DISCOVERY**

In compliance with the “Standing Order for Discovery and Inspection”, D-4, Dominique Glenn, by counsel, SANFORD PLOTKIN, hereby provides the government with the following requests and notices:

1. It is requested that the government provide copies of :
  - A. Any information within the meaning of paragraph 1 (a) of the Standing Order and/or Federal Rule of Criminal Procedure 16 (a)(1), including specifically:
    - I. Any statement of defendant, as required by Rule 16 (a)(1)(A);
    - ii. Defendant’s prior criminal record, as required by Rule 16 (a)(1)(B);
    - iii. Any documents and tangible objects material to the preparation of the defense, intended to be used in the government’s case-in-chief, or obtained from or which belong to defendant, as required by Rule 16 (a)(1)(c);

iv. Any reports of examinations and tests, as required by Rule 16 (a)(1)(D);  
and

v. A written summary of the testimony of any expert witness, as required by Rule 16 (a)(1)(E).

B. Any exculpatory evidence or impeachment evidence within the meaning of Standing Order paragraph 1(b) and/or *Brady v Maryland*, 373 U.S. 83 (1963) and *U.S. v Agurs*, 247 U.S. 97 (1976).

C. Any document that will be used to refresh the memory of a witness, within the meaning of Standing Order paragraph 8, and/or Fed Rule of Evidence 612.

D. Any statement by persons who have possible knowledge or information relative to this case, which is not protected from disclosure by 18 U.S.C. 3500(a).

E. Any statements of witnesses within the meaning of 18 U.S.C. 35 e. Defendant acknowledges that such statements are purportedly protected by statute from disclosure at this point in the proceedings. Nevertheless, she requests immediate disclosure to protect her constitutional rights, including but not limited to, the right to effective assistance of counsel and effective cross-examination. Failure to do so will, in all likelihood, necessitate delays during trial to prepare for cross-examination.

2. Defense requests that the prosecution provide an opportunity to review the documents or records relating to the chain of possession of any exhibit, which the prosecution intends to introduce in evidence at trial, as required by paragraph 6 of the Standing Order.

3. Notice is given that, pursuant to paragraph 5(b) of the Standing Order, the foundation of any and all exhibits may be contested.

4. Notice is given, pursuant to paragraph 6 of the Standing Order, that the chain of possession of any and all exhibits may be contested.

5. Notice is given, pursuant to paragraph 7 of the Standing Order, that any scientific analysis or summary testimony by experts will be contested unless there has been a proper basis for the testimony under FRE 702, 703, 705 and 1006.

6. Notice is requested of the nature of any evidence of other crimes, wrongs or acts of defendant that the government will seek to admit pursuant to FRE 404(b).

7. Notice is requested, pursuant to Fed Rule Crim Procedure 12(d)(2), of the government's intent to use in its case-in-chief any evidence which defendant is entitled to discover under Fed Rule Criminal Procedure 16.

8. All requests for information, materials, or evidence contained herein are continuing, and the prosecution is expected to immediately provide any additional information, materials, or evidence as required by paragraph 3 of the Standing Order and/or Fed Rule Criminal Procedure 16 (c).

9. Notices contained herein shall remain in effect until expressly withdrawn.

Respectfully submitted,

**Sanford Plotkin**

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Dated: January 15, 2025